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August 13, 2025

BY ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Lively v. Wayfarer Studios LLC, et al.*, No. 1:24-cv-10049-LJL

Dear Judge Liman:

As noted in our filing last night, we have created an expanded and revised privilege log to further clarify the limited scope of materials withheld by our clients, nonparties Katherine Case and Breanna Butler Koslow, on the basis of attorney-client privilege and attorney work product.

This revised privilege log breaks out communications on a conversation-by-conversation basis, where each “conversation” represents a 24-hour period of messages that contained an agreed-upon search term. The dates in the log represent the dates of those conversations, whereas our original privilege logs were based upon metadata, which at times would list an earlier date associated with an embedded file (*e.g.*, an image) in the message string.

In light of our provision of this information, we would not oppose Ms. Lively submitting a reply in further support of her motion, taking into account the clarified information present in this privilege log.

Respectfully submitted,

Maxwell Breed

cc: Counsel of Record (by ECF)
Enclosures